

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
:   
Cincearae Kelly : No. 21-12022-MDC  
Debtor :

ANSWER TO MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, AS  
SUCCESSION TRUSTEE TO CITIBANK, N.A., AS TRUSTEE FOR FIRST FRANKLIN  
MORTGAGE LOAN TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES,  
SERIES 2005-FF12 FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION  
362 AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted due to the death of Debtor's sister.
7. Denied for lack of proof.
8. Denied.
9. Denied.
10. No objection.
11. No response required.

WHEREFORE Debtor respectfully requests this Honorable Court  
deny Movant's Motion for Relief

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 10/01/2021

A copy of this Answer is being served on Rebecca Ann Solarz,  
Esquire, and the Chapter 13 Trustee.